

FILED

JAN - 8 2008

CLERK J. W. WILHELM
NORTHERN DISTRICT COURT
SAN JOSE

1 ROBERT E. CAREY, JR., ESQ. (SBN 47556)
2 CAREY & CAREY
3 706 COWPER STREET
P.O. BOX 1040
PALO ALTO, CA 94302-1040
650/328-5510
650/853-3632 FAX

5 Attorneys for Defendant
JOSE BONILLA

6

7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,

CASE NO. CR-07-00251 RMW

12 Plaintiff,

STIPULATION RE TRAVEL
REQUEST OF DEFENDANT
JOSE BONILLA AND
[proposed] ORDER THEREON

13 vs.

14 JOSE BONILLA,

15 Defendant.

16
17 ITS IS HEREBY STIPULATED, by and between THOMAS M. O'CONNELL, ESQ.,
18 attorney for the UNITED STATES OF AMERICA, and ROBERT E. CAREY, JR., counsel
19 for Defendant JOSE BONILLA, that Mr. BONILLA be allowed to travel outside of the
20 Northern District of California, from January 6, 2008 through January 12, 2008.

21 The purpose of this trip is for the Defendant and his family to visit Mr. BONILLA'S
22 father, Jose Bonilla, Sr., in Merced, California. Mr. Bonilla, Sr., is suffering from a variety
23 of illnesses, including kidney failure, liver problems, and high blood pressure. The
24 Defendant will be travel via car and will stay in a hotel during his visit.

25 ///

26 ///

27 ///

28 ///

1 I have contacted the Pretrial Services Officer for Mr. BONILLA, Mr. Anthony
2 Granados, and he does not have any objection to this travel request.

3 IT IS SO STIPULATED.
4

5 DATED: January 4, 2008 CAREY & CAREY
6

7 /s/
8 ROBERT E. CAREY, JR. Attorneys for
9 Defendant RAIMUND WERSCHING

10 DATED: 1/4, 2007 UNITED STATES OF AMERICA
11

12 /s/
13 THOMAS M. O'CONNELL, Attorneys
14 for Plaintiff

15
16
17 ORDER
18 GOOD CAUSE APPEARING THEREFORE, it is hereby ordered, adjudged, and
19 decreed, that Mr. BONILLA be allowed to travel to Merced, California, from January 6, 2008
20 through January 12, 2008.

21
22 DATED: 1 - 8 - 2008
23


24 HOWARD B. LLOYD RICHARD JESSOPH
25 MAGISTRATE-JUDGE OF THE
26 U.S. DISTRICT COURT
27
28